

HM/PP:KTF/BW/DIB
F. #2024R00288

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

MAHMUD MOLLAH,

Defendant.

----- X

THE UNITED STATES ATTORNEY CHARGES:

I N F O R M A T I O N

Cr. No. 24-CR-389
(T. 18, U.S.C., §§ 981(a)(1)(C), 1349 and
3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

WIRE FRAUD CONSPIRACY

1. In or about March 2024, within the Eastern District of New York and elsewhere, the defendant MAHMUD MOLLAH, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud Sports Betting Companies 1 and 2, entities the identities of which are known to the United States Attorney, and to obtain money and property from Sports Betting Companies 1 and 2 by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

by Alixandra Smith, Assistant U.S. Attorney

BREON PEACE

UNITED STATES ATTORNEY

EASTERN DISTRICT OF NEW YORK